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Attorneys for Defendant City of North Las Vegas

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10 **UNITED STATES DISTRICT COURT**  
11  
12 **DISTRICT OF NEVADA**

13 GATHER COHEN,  
14 Plaintiff,

15 Case Number:  
16 2:22-cv-01417-JAD-EJY

17 vs.  
18 CITY OF NORTH LAS VEGAS, a  
19 Municipal Corporation and political  
20 subdivision of the State of Nevada; DOES I-  
X,  
Defendants.

15 **STIPULATION AND ORDER**

16 **(FIRST REQUEST)**

17 Plaintiff Gather Cohen (“Plaintiff”), by and through their counsel of record, James P.  
18 Kemp, Esq., of Kemp & Kemp, Attorneys at Law, and Defendants, and Defendant City of  
19 North Las Vegas (“Defendant”), by and through their counsel of record, Nick D. Crosby,  
20 Esq. and Jackie V. Nichols, Esq., of Marquis Aurbach, hereby agree and jointly stipulate the  
following:

21 1. Defendant filed their Notice of Removal on August 31, 2022. *See* ECF No.  
22 1;

23 2. Defendant’s Answer or Motion to Dismiss is currently due on September 7,  
24 2022;

25 3. Defendant’s counsel is currently in trial in the *Faye Rivera v. LVMPD*,  
26 District Court, Clark County, Nevada (A-17-766014-C) and is unable to meet the deadline  
27 of September 7, 2022 currently scheduled for Defendant’s Answer or Motion to Dismiss;

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4. The Parties have agreed to a 7-day extension for Defendant's Answer or Motion to Dismiss;

5. Accordingly, the deadline for Defendant's Answer or Motion to Dismiss, currently due on September 7, 2022, be extended to and including Wednesday, September 4, 2022;

6. This is the Parties' first request to extend the deadline to Defendant's Answer or Motion to Dismiss; and

7. This Stipulation is being entered in good faith and not for purposes of delay.

## IT IS SO STIPULATED.

Dated this 7th day of September, 2022.

Dated this 7th day of September, 2022

# KEMP & KEMP, ATTORNEYS AT LAW

MARQUIS AURBACH

By: /s/ James P. Kemp

James P. Kemp, Esq.  
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Attorney for Plaintiff Gather Cohen

By: /s/ Jackie V. Nichols

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Attorneys for Defendant City of North  
Las Vegas

## ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED this 7th day of September, 2022.

Elayna J. Zouchal  
UNITED STATES MAGISTRATE JUDGE